

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: ZIMMER NEXGEN KNEE)
IMPLANT PRODUCTS LIABILITY) MDL NO. 2272
LITIGATION)
)
This Document Relates to All Cases) Master Docket Case No. 1:11-cv-05468
)
) Hon. Rebecca Pallmeyer

**JOINT MOTION FOR ENTRY OF STANDING ORDER NO. 1
REGARDING ORIGINATING COURT DEADLINES**

The defendants and Proposed Co-Lead Plaintiffs' Counsel in the above-referenced matter (collectively, "the Parties"), respectfully request that this Court enter an order staying all deadlines entered by the originating courts prior to transfer to this Court as part of multidistrict proceedings styled *In Re: Zimmer NexGen Knee Implant Products Liability Litigation*, MDL No. 2272 ("MDL-2272"), including but not limited to any deadline for an answer or other response to a complaint or petition, the period for initial disclosures pursuant to Rule 26 of the Federal Rules of Civil Procedure, and any other discovery and pretrial deadlines.

In support of this Motion, the Parties state:

1. On August 8, 2011, the Judicial Panel on Multidistrict Litigation ("JPML") entered Transfer Order [MDL-2272, Doc. 110], transferring twenty-eight matters listed in Transfer Order's Schedule A to this Court for centralized pre-trial proceedings in MDL-2272.
2. On August 19, 2011, the JPML issued Conditional Transfer Order (CTO-1) [MDL-2272, Doc. 125], transferring an additional forty-five matters to MDL-2272.
3. The plaintiffs and the defendants have filed a variety of notices of potential tag-along matters. The Parties anticipate that the JPML will transfer additional tag-along matters to MDL-2272 in the future.

4. Prior to the JPML's August 8 and 19, 2011, transfer orders, a portion of the courts in which the transferred matters (and soon-to-be transferred tag-along matters) originated entered scheduling orders. In addition, other deadlines have arisen in the transferred matters pursuant to local rule.

5. The Parties respectfully request that this Court enter a Standing Order staying all deadlines established by order of the originating courts or local rule, as a stay will permit this Court to enter a coordinated and appropriate schedule applicable to multiple or all of the matters transferred to the JPML on August 8 and 19, 2011, as well as those matters transferred to MDL-2272 in the future.

WHEREFORE, the Parties respectfully request that this Court enter a standing order staying all deadlines entered by the originating court or arising by virtue of local rule in matters transferred to MDL-2272, as well as the deadlines in matters transferred to MDL-2272 in the future, including but not limited to any deadline for an answer or other response to a complaint or petition, the period for initial disclosures pursuant to Rule 26, and other discovery and pretrial deadlines.

Dated: August 26, 2011

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on August 26, 2011, a copy of the foregoing Joint Motion for Entry of Standing Order No. 1 Regarding Originating Court Deadlines was filed electronically. Parties may access this filing through the Court's system. I further certify that on August 26, 2011, a copy of this document was sent by first-class United States mail, postage prepaid, upon the following:

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